



FAMILY INVESTMENT ADMINISTRATION

Policy Number:	25-07
Policy Title:	Missing or Invalid Social Security Number
Release Date:	January 22, 2025
Effective Date:	Immediately
Approved By:	Augustin Ntabaganyimana Executive Director Family Investment Administration
Revision Date(s):	Original: July 21, 2011
Supersedes:	FIA Action Transmittal (AT) #12-01 (previous version released July, 2011)
Originating Office:	Office of Operations fia.policy@maryland.gov
Required Actions:	Ensuring all customers have a valid Social Security number or file an application.
Key Words:	SSN, Valid SSN, Invalid SSN, Missing SSN, Social Security number
Related Federal Law	7 CFR § 273.6
Related State Laws	Not Applicable
COMAR	07.03.03.07E 07.03.17.11 10.09.24.04L
State Plan Implications?	No State Plan Implication

 <p>Maryland Department of Human Services</p> <p>Department of Human Services 25 S Charles Street Baltimore MD 21201</p>	<p>FAMILY INVESTMENT ADMINISTRATION (FIA) ACTION TRANSMITTAL</p>
<p>Control Number: # 25- 07</p>	<p>Effective Date: Immediately Issuance Date: January 22, 2025</p>

**TO: LOCAL DEPARTMENTS OF SOCIAL SERVICES (LDSS) DIRECTORS,
LDSS DEPUTY/ASSISTANT DIRECTORS FOR FAMILY INVESTMENT,
FAMILY INVESTMENT SUPERVISORS AND ELIGIBILITY STAFF**

FROM: AUGUSTIN NTABAGANYIMANA, EXECUTIVE DIRECTOR 

RE: MISSING OR INVALID SOCIAL SECURITY NUMBER

**PROGRAM AFFECTED: SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP)
TEMPORARY CASH ASSISTANCE PROGRAM (TCA)
MEDICAL ASSISTANCE PROGRAMS (MA)**

ORIGINATING OFFICE: OFFICE OF OPERATIONS

Summary

The 2022 Legislative Audit included a repeat finding that the Family Investment Administration (FIA) did not adequately ensure that missing or invalid Social Security numbers (SSN) were properly investigated and resolved. All customers must have a valid SSN or have filed a current application for a SSN to receive any assistance in Maryland. Customers who do not have a SSN or refuse to apply for a number without good cause may not receive assistance.

Required Action

Effective immediately, case managers must review all E&E alerts that identify a missing or invalid SSN and complete the required action by the established due date.

E&E generates an alert when the customer’s SSN application pends longer than six months or the match with the Social Security Administration (SSA) files shows it to be invalid.

Supersedes: FIA Action Transmittal #12-01 (previous version released July, 2011)

FIA Central Required Actions

Beginning November 2024, the Office of Local Operations will monitor the [Eligibility & Enrollment SSN Alerts Outstanding Report](#). A memorandum will be emailed to the local jurisdiction's leadership or designees reminding local staff to properly address the outstanding alerts for open cases.

Beginning February 2025, the Bureau of Quality Control's Management Evaluation Unit will review ten percent of all alerts for open cases that populate on the [Eligibility & Enrollment SSN Alerts Generated Report](#) for the sampled month. If any errors are found, Error Response forms will be emailed to the local jurisdiction's leadership or designees.

Local Jurisdiction Required Actions

Case managers and/or designated staff must:

1. Review the alert's description and subtype to determine the best approach to properly address the case;

ALERT DISPOSITION

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Dispose Alert
Case ID: 123456789
Description: SSN not federally verified, SSN & name does not match for one of the household members
Assign Worker

Type: Electronic Data Exchange
Create Date: 02/07/2024

Transfer Alert

Subtype: SSN not federally verified, SSN & name does not match for one of the household members
Due Date: 03/08/2024

a. Alert descriptions and subtypes

- i. Client SSN missing
- ii. SSN not federally verified, DOB & sex code does not match for one of the household members
- iii. SSN not federally verified, DOB does not match for one of the household members
- iv. SSN not federally verified, sex code does not match for one of the household members
- v. SSN not federally verified, SSN & name does not match for one of the household members
- vi. SSN not federally verified, SSN cannot be found in the SSA database for one of the household members

- vii. Verification cannot be provided for one of the household members for one or more reasons
 - viii. 996 - SSN not federally verified
 - ix. 997 - SSN not received
 - x. Per EVS, DOB does not match
 - xi. Per EVS, Sex Code & DOB do not match
 - xii. Per EVS, SSN and name do not match
 - xiii. Per EVS, Sex Code does not match
 - xiv. Per EVS, SSN is not on SSA database
2. If the required information/verification is located in the case file, update E&E system's Member Details and Member Verification screens;
 - a. Continue to follow the steps detailed in the [How-to-Guide: Verify Member Details](#) located in E&E's Help section.
 3. If the required information/verification is **not** located in the case file, immediately call and/or issue a 1052 Request for Verification detailing the exact information/verification(s) needed to resolve the discrepancy.
 - a. The 1052 due date is 10 days following the 1502's issuance date;
 4. If the customer returns the requested verification/information by the 1052's due date, update E&E system's Member Details and Member Verification screens;
 - a. Continue to follow the steps detailed in the [How-to-Guide: Verify Member Details](#) located in E&E's Help section.
 5. Narrate all actions taken on or for a household;
 6. Disposition the alert by the alert's due date; and/or
 7. Follow the appropriate program policy if the customer does not provide the requested information/verification to resolve the discrepancy.

Policy Reminders

SNAP Policy

Failure to Comply

The disqualification applies only to the individual for which the SSN is not provided. The disqualification does not apply to the entire household. The individual is disqualified from participation unless good cause exists. Absent good cause an individual is disqualified if

- A. the individual cannot provide evidence of application for SSN within six months, and evidence cannot be found on SOLQ; or
- B. a household member refuses or fails to provide or apply for an SSN.

Calculating Income and Resources

The income and resources of individuals disqualified for failure to comply with SSN requirements are handled in the following manner:

- A. Resources - Consider the total value of the disqualified household member's resources available to the household.
- B. Income - Prorate the disqualified member's income in the following manner:
 1. Divide the disqualified member's monthly income (minus the earned income deduction) by the total number of household members including the disqualified member; then
 2. Multiply the above amount by the number of eligible household members excluding the disqualified member.

Example: A disqualified member's monthly income (minus the earned income deduction) is \$400. Four individuals are in the SNAP household including the disqualified person.

$$\$400/4 = \$100$$

$$\$100 \times 3 = \$300$$

\$300 is the prorated amount of a disqualified member's income used in the SNAP income calculation.

Deductible expenses - Do not count the prorated share of the disqualified member's expenses as expenses deductible for the remaining household members. Prorate the deductible expenses in the following manner:

1. Divide the disqualified member's deductible expenses by the total number of household members including the disqualified member; then
2. Multiply the above amount by the number of eligible household members excluding the disqualified member.

Example: A disqualified member's monthly expenses are as follows: \$1,000 for rent, \$250 for gas/electric, and \$350 for child care expenses. Four individuals are in the SNAP household including the disqualified person.

Rent Proration	Gas/Electric Proration	Child Care Proration
$\$1,000/4 = \250	SUA	$\$350/4 = \87.50
$\$250 \times 3 = \750	SUA is given. No proration needed.	$\$87.50 \times 3 = \262.50
\$750 is the prorated amount used in the SNAP calculation.		\$262.50 is the prorated amount used in the SNAP calculation.

Exception 1: If the disqualified person is entitled to a medical expense deduction, the household is not entitled to any portion of this person's deduction during the disqualification period.

Exception 2: If the disqualified person is the only senior or disabled member of the household, the household is not entitled to the uncapped shelter deduction.

Good Cause for Failure to Comply

In determining if good cause exists for failure to comply with the requirement to provide or obtain a SSN, analyze the information received from the household member, the Social Security Administration, and the local department. If the individual applying for the SSN is unable to obtain the documents required by the Social Security Administration, the case manager must make every effort to assist the individual in obtaining these documents.

If the household member can show good cause why an application for a SSN was not completed in a timely manner, allow that individual to participate for one month in addition to the month of application.

Good cause for failure to apply must be shown monthly for the individual/

household to continue to receive benefits. Once the individual applies for a SSN and provides the required verification, allow the individual to continue receiving benefits pending notification of the individual's SSN.

TCA Policy

The household must provide the local department with a SSN for all household members or proof that the individual has applied for a SSN. A household is not eligible for benefits if

- A. the individual does not have a SSN and is unable to apply for a SSN; or
- B. a caretaker relative refuses to provide proof of application for a SSN, or fails to cooperate in obtaining proof, resulting in the household's ineligibility.

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Once the individual applies for a SSN and provides the required verification, allow the individual to continue receiving benefits pending notification of the individual's SSN.

MA Policy

As a condition of eligibility, applicants and recipients must provide the local agency with a Social Security card (or cards if more than one number has been issued) for each member of the assistance unit and any individual whose income and resources are considered in determining the financial eligibility of the assistance unit.

If the applicant or recipient cannot furnish a Social Security card for each of these individuals, the individual must apply for a card.

Application for the card and verification of that fact are requirements that must be

met before eligibility can be granted.

If an applicant or recipient is physically or mentally incapable of representing themselves or lacks the resources to meet the above requirements, the local agency must assist the individual with obtaining the necessary documents.

If the application indicates that a Social Security card was issued previously, the local agency must request validation of the number by the Social Security Administration.

Resources

[SNAP Policy Manual Section 405](#)

[TCA Policy Manual Section 312](#)

[Medicaid Eligibility Manual Section 400.8\(a\)](#)

Inquiries

Please direct policy questions to FIA Policy by completing the [FIA Policy Information Request Form](#). Montgomery County staff may submit their policy questions via email at fia.policy@maryland.gov. For questions related to E&E, please email fia.bsdm@maryland.gov.

cc: DHS Executive Staff
Constituent Services
DHS Help Desk
FIA Management Staff
Office of Administrative Hearings